

## **Exhibit B**



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Our File No.  
 35477-123

March 26, 2025

**BY EMAIL**

Allen Schwartz, Esq.  
 Schwartz Law PLLC  
 150 Broadway, Suite 701  
 New York, NY 10038

Robert C. Lorenc, Esq.  
 The Lorenc Law Firm  
 62 West 45<sup>th</sup> Street, Suite 903  
 New York, NY 10036

**Re: *Jeffrey Simpson v. Jared Chassen, et al.*, Index No. 158055/2023**

Dear Messrs. Schwartz and Lorenc:

We are proposed counsel to Eric Huebscher, in his capacity as court-appointed receiver (the “Receiver”) over: (1) JJ Arch’s managerial and membership interests in the JJ Arch Controlled Entities; (2) the JJ Arch Controlled Properties; and (3) JJ Arch’s bank accounts, records, and funds, and the JJ Arch Controlled Entities’ funds, assets properties, records, and bank accounts, pursuant to the Order Appointing Temporary Receiver dated March 11, 2025 (NYSCEF Doc. No. 1360) (the “Receivership Order”).<sup>1</sup>

As directed by the Receivership Order, demand is made that JJ Arch, Mr. Simpson and Mr. Chassen provide the Receiver with the following by Wednesday, April 2, 2025:

1. All books and records and books of account of JJ Arch and the JJ Arch Controlled Entities;
2. An inventory of all assets belonging to the JJ Arch Controlled Entities, including a list of vehicles at, or that were at, Rever Motors, since August 16, 2023, whether title is in Mr. Simpson’s name, the name of any entity controlled by Mr. Simpson, or the name of a JJ Arch Controlled Entity;
3. The original certificates of title for each vehicle owned by any of the JJ Arch Controlled Entities;
4. A list of all employees at the JJ Arch Controlled Entities or JJ Arch Controlled Properties since August 16, 2023, all payroll records for such employees, and any evidence that payroll taxes were paid for such employees;
5. Copies of all filed tax returns for JJ Arch and the JJ Arch Controlled Entities, and all correspondence from or to the Internal Revenue Service or any other governmental entity;
6. All banking records for JJ Arch and the JJ Arch Controlled Entities;
7. All books, logs, spreadsheets, and other documents detailing the transactions at the JJ Arch Controlled Entities and funds and assets belonging to the JJ Arch Controlled

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<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Receivership Order.

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- Entities;
8. Keys to, or any other items, codes, or similar required to access the JJ Arch Properties;
  9. All appraisals, broker price opinions, or other valuations of the JJ Arch Controlled Entities and the JJ Arch Properties;
  10. All loan documents to which any of the JJ Arch Controlled Entities are a party or that relate to any of the JJ Arch Properties; and
  11. All contracts to which any of the JJ Arch Controlled Entities are a party.

We thank you in advance for your cooperation.

Best regards,

By: */s/Martin G. Bunin*  
Martin G. Bunin